



04-CV-05751-STIP

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CLERK U.S. DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT TACOMA	
BY	DEPUTY

THE HONORABLE RONALD B. LEIGHTON

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

ANDREA WOLBER,

Plaintiff,

v.

KITSAP MENTAL HEALTH
SERVICES, a Washington Corporation,
and ENDRE VOROS and MRS. JANE
DOE VOROS and their marital
community,

Defendants.

No. 04-5751 RBL

STIPULATION AND ~~(PROPOSED)~~
ORDER TO MOVE TRIAL DATE
AND CORRESPONDING DATES
OTHER THAN EXPERT AND
REBUTTAL WITNESS
DISCLOSURES

WHEREAS, the parties believe that additional time is necessary to complete discovery in an orderly and cooperative manner. Since the discovery cutoff is looming, moving the trial date and most of the deadlines associated with it would help the parties efficiently and cooperatively move the case forward. This will help facilitate cooperatively resolving discovery disputes. It will also help to minimize the need for multiple follow-up depositions, and motions for relief from the current case deadlines.

1 **WHEREAS**, the parties explored other options short of moving the trial date
2 and due to other trial and personal commitments in this fall it was agreed that a request for a
3 trial continuance was the only workable solution.

4 **WHEREAS**, the parties agree to confer within a week after the signing of this
5 order. The parties at that time will work together to create a discovery plan, which includes
6 the scheduling of remaining depositions and the production of remaining documents.

7 **WHEREAS**, a continuance could help avoid additional motion practice if the
8 parties are allowed the time to work towards resolution and finish the remaining discovery as
9 needed. The parties remain in dispute on several discovery issues, and it is hoped that
10 additional time will aid in facilitating resolutions that do not require Court resources and
11 time. Discovery is being completed in this case and both sides have been working hard
12 towards that end.

13 **THEREFORE THE PARTIES RESPECTFULLY REQUEST** that the trial
14 date be continued to Monday, April 16, 2007, and all relevant deadlines (other than expert
15 witness disclosures) shall be moved in accordance with the new trial date.

1 It is so STIPULATED this 14th day of July, 2006.

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3
4 **THE BLANKENSHIP LAW FIRM, P.S.**

LAW OFFICES OF

JOHN FRANCIS KENNEDY

5
6
7 /s/ Scott C.G. Blankenship

/s/ John Francis Kennedy

8 Scott C.G. Blankenship

John Francis Kennedy

9 WSBA No. 21431

WSBA No. 5692

10 Garrett R. Ferencz

Attorneys for Defendants

11 WSBA No. 32883

12 Attorneys for Plaintiff

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14 **IT IS SO ORDERED** this ____ day of July, 2006.

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18 
19 Honorable Ronald B. Leighton